

# EXHIBIT F.1

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK SOKOLOW, et al.,

Plaintiffs,

Civ. No. 04-397 (GBD) (RLE)

v.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

**THE MANDELKORN PLAINTIFFS' FIRST REQUEST  
TO PRODUCE DOCUMENTS AND THINGS  
(Nos. 1-4)**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure and the Local Rules of this Court, plaintiffs Leonard Mandelkorn, Shaul Mandelkorn and Nurit Mandelkorn ("Plaintiffs"), by counsel, request that Defendants the Palestinian Authority and the Palestine Liberation Organization produce the documents and things described below to Plaintiffs' counsel within 30 days of the service of these requests.

**INSTRUCTIONS AND GENERAL DEFINITIONS**

1. Defendants shall respond to these requests as required by the Federal Rules of Civil Procedure and the Local Rules of this Court.
2. The definitions and rules of construction set forth in the Federal Rules of Civil Procedure and the Local Rules of this Court are incorporated by reference herein and govern these requests.

**SPECIFIC DEFINITIONS**

1. "PA" means and refers to defendant The Palestinian Authority and any ministry, agency, division, bureau, department or instrumentality thereof.

2. "PLO" means and refers to defendant The Palestine Liberation Organization and any agency, division, bureau, department or instrumentality thereof.

3. "Defendants" means and refers collectively to Defendants PA and PLO and any ministry, agency, division, bureau, department or instrumentality thereof.

4. "Awada" means and refers to Sa'id Awada who carried out, and was killed as a result of, the June 19, 2002, bombing which harmed the Plaintiffs. Awada's full name may be Sa'id Waddah Hamed Awada and his identity number may be 946480720.

**REQUESTS FOR DOCUMENTS AND THINGS**

1. All documents concerning the June 19, 2002 bombing from which the Plaintiffs' action arises.

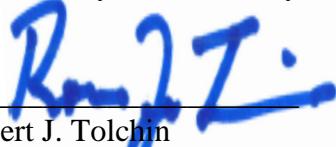
2. All documents concerning all positions and jobs held by Awada in the PA and/or PLO and all work and employment performed by Awada for the PA and/or PLO, between September 1, 2000 and June 19, 2002, including without limitation all documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all such positions, jobs, work and employment; (ii); the rank or ranks held by Awada in all such positions, jobs, work and employment; and (iii) the time periods during which Awada held and provided such positions, jobs, work and employment.

3. All documents concerning all payments made by the PA and/or PLO to Awada between September 1, 2000 and June 19, 2002.

4. All documents concerning all payments made to and all benefits provided to Awada's relatives by the PA and/or PLO at any time after June 19, 2002, in relation to, as a result of and/or due to Awada's death.

March 26, 2012

Plaintiffs, by their Attorney,



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 26, 2012, a true copy of the foregoing was sent by first class mail and electronic mail to Defendants' counsel of record listed below:

Brian A. Hill, Esq.  
Miller & Chevalier Chartered.  
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Robert J. Tolchin